

1. On August 23, 2022, Plaintiff filed her verified Complaint. After an agreed extension, on November 16, 2022, Defendants answered the Complaint.
2. On January 11, 2023, Defendants filed their Motion for Judgment on the Pleadings. After an agreed extension of time, Plaintiff filed her Objection on February 6, 2023.
3. Under Local Rule 7.1(e)(1), a Reply to the Objection would be due on the date of this Motion, February 13, 2023. Undersigned counsel intended to complete and file a Reply by today's deadline but other matters interceded.
4. Defendants request a five-day extension of time, until February 17, 2023, to file their Reply.
5. This extension will not unduly delay this proceeding or unduly prejudice any party to this case.
6. Pursuant to Local Rule 7.1(a)(2), given the nature of the relief sought and

Plaintiff's assent, no memorandum of law is submitted in support of this Motion.

7. Pursuant to Local Rule 7.1(c), Plaintiff's counsel assents to the extension requested by this Motion.

WHEREFORE, Defendants respectfully request that the Court:

- A. Grant this Motion;
- B. Extend the deadline for Defendants' Reply to February 17, 2023; and
- C. Issue any further relief the Court deems just and proper.

Respectfully submitted,

**JAMES DONCHESS, MAYOR OF THE
CITY OF NASHUA, NEW HAMPSHIRE
JOHN GRIFFIN, CHIEF FINANCIAL
OFFICER OF THE CITY OF NASHUA, NEW
HAMPSHIRE**

By Their Attorneys,

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Dated: 2/13/23

/s/ Adam B. Pignatelli

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served through the Court's CM/ECF system.

Dated: 2/13/23

/s/ Adam B. Pignatelli

Adam B. Pignatelli